



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

January 15, 2008

The Honorable Judith Spang, Chairman  
Resources, Recreation and Development Committee  
Legislative Office Building, Room 305  
Concord, New Hampshire 03301

**Re: HB 1629, relative to the evaluation of recycling and energy conversion options for grease trap wastes at the Winnepesaukee River Basin Program's Franklin wastewater treatment facility and making an appropriation therefor.**

Dear Chairman Spang:

Thank you for the opportunity to provide comments on HB 1629 which proposes to make an appropriation of \$100,000 for the evaluation of recycling and energy conversion options for grease trap wastes at the Winnepesaukee River Basin Program's Franklin wastewater treatment. While we recognize the need to address fat, oil and grease (FOG<sup>1</sup>) disposal by methods such as those proposed in this bill, the Department of Environmental Services (DES) recommends that general fund appropriations for this purpose be considered as part of the biennial budget cycle rather than at this time.

During the 2006 Legislative Session, HB 1373 was enacted into law creating a study commission to study methods to encourage the proper recycling and disposal of grease trap waste, and to determine ways to develop additional disposal capacity. The FOG Study Commission was directed to study:

- I. Ways to ensure the proper recycling and disposal of grease trap wastes.
- II. Systems for managing grease trap wastes in the United States and Canada.
- III. The status of the in-state and regional markets available for handling grease trap wastes and methods for future development of in-state disposal capacity.
- IV. The ability of DES to assist municipalities in regard to rules, regulations, penalties, and best management practices for grease trap sizes, cleaning cycles, standards and pumping.

Upon your request, we would be happy to provide the Committee with copies of the final Commission report, which was filed in November 2007, as well as a detailed presentation on the report findings. In this report, the Commission concluded in part that New Hampshire was deficient in FOG disposal capacity and, in order to encourage proper maintenance of grease traps or interceptors, additional disposal outlets for brown grease were needed.

<sup>1</sup> FOG is mostly generated by the food service industry during the preparation of food and the cleaning of dishes and utensils. It is typically captured in a grease trap or interceptor located either inside or outside of the food service building. The collected grease must be removed for disposal at regular intervals or the grease trap will become overloaded and fail.

For the FOG Commission Report, DES estimated based on a telephone survey that nearly 2.5 million gallons of grease trap waste were generated for disposal in New Hampshire during 2006. We also estimated that 94% of the facilities that received FOG from New Hampshire were wastewater treatment plants and that disposal of approximately 70% of FOG waste generated in New Hampshire was at out-of-state facilities. The FOG Study Commission also recognized that FOG has significant energy potential, and sought information on new developments, pilot projects and/or experimental work toward energy recovery from brown grease. Through its research, the Commission discovered that the most promising technologies involve the conversion of FOG into the production of biodiesel or methane gas through a digestion process. HB 1629 was proposed in consideration of the fact that the WRBP wastewater treatment plant uses anaerobic digestion to process its sludge and, therefore, has the potential to be used for FOG disposal.

In conclusion, DES will continue to support implementation of the recommendations proposed in the HB 1373 Legislative Study Commission and to explore recycling options for the management of grease trap waste. However, as noted above, we recommend that general fund appropriations for this purpose be considered as part of the next biennial budget cycle rather than at this time.

If you have any questions, please contact Patricia Hannon, Supervisor, Residuals Management Section at 271-2758 or e-mail [Patricia.Hannon@des.nh.gov](mailto:Patricia.Hannon@des.nh.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas S. Burack". A large, red, diagonal "COPY" stamp is overlaid across the signature.

Thomas S. Burack  
Commissioner

cc:

Rep. Peter Schmidt  
Harry T. Stewart, P.E., Director  
Paul Heirtzler, P.E., Esq., Administrator  
Patricia Hannon, Supervisor